

John T. Pion, Esquire
Michael F. Nerone, Esquire
Bradley N. Sprout, Esquire
Attorney I.D. No. 43675 / 62446 / 203182
E-mail: jpion@pionlaw.com
E-mail: mnerone@pionlaw.com
E-mail: bsprout@pionlaw.com
PION, NERONE, GIRMAN, WINSLOW & SMITH, P.C.
2404 Park Drive
Harrisburg, PA 17110
Phone: 717-737-5833

Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MICHAEL LEPKA	:	
Plaintiff	:	No. 3:22-cv-00467-MEM
 v.	:	 CIVIL ACTION – LAW
 CHARLES H. GARTON, III, RUAN	:	
TRANSPORT CORP., and RUAN	:	
TRANSPORTATION MANAGEMENT	:	
SYSTEMS, INC.	:	
Defendants	:	JURY TRIAL DEMANDED

STIPULATION

AND Now, Come the parties to the above-captioned action, by and through their respective counsel and do hereby agree and stipulate that all allegations that the Defendants' conduct was "gross, wanton and/or reckless" are stricken from the Complaint, without prejudice.

PION, NERONE, GIRMAN, WINSLOW & SMITH, P.C.

By: Michael F. Nerone Date: 4/1/22
Michael F. Nerone, Esquire

MUNLEY LAW, P.C.

By: Robert W. Munley Date: 4/1/22
Robert W. Munley, III